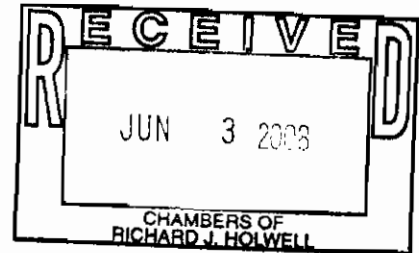


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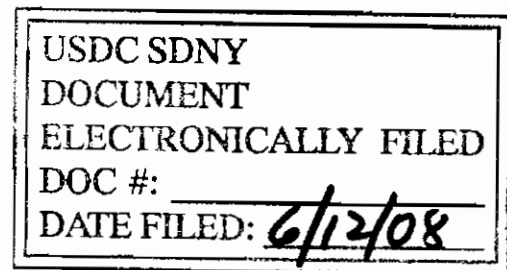


GAIL R. ZWEIG
COUNSEL

June 2, 2008

By Federal Express

The Honorable Richard J. Holwell
United States District Court for the
Southern District of New York
500 Pearl Street, Room 1950
New York, NY 10007-1312



Re: *Ridge Clearing and Outsourcing Solutions, Inc. v. Khashoggi*,
2007 Civ. 06611 (RJH)

Dear Judge Holwell:

We represent plaintiff Ridge Clearing and Outsourcing Solutions, Inc. in the above action. I am writing to respectfully request that the Court direct defendant to immediately comply with the Court's Scheduling Order and plaintiff's discovery demands, upon penalty of striking of his answer, in light of the fact that, as described more fully below, defendant has failed to serve his initial disclosures; has not produced any documents or served any objections in response to a document request pursuant to Fed. R. Civ. P. 26 and 34 served on him; and has failed to appear for deposition, which was noticed for May 1, 2008.

By way of background, on or about July 23, 2007, plaintiff commenced this action by filing a summons and complaint. Thereafter, plaintiff served the Complaint and an Amended Complaint on defendant Khashoggi on September 5 and September 13, 2007, respectively. Defendant's time to answer expired on September 28, 2007, and defendant did not answer the Complaint or Amended Complaint in a timely manner. Nor did defendant Khashoggi or any attorney acting on his behalf respond to a letter from me dated September 10, 2007, which letter was sent to defendant Khashoggi by International Federal Express, enclosing a copy of the Initial Scheduling Conference Notice and Order and requesting that defendant Khashoggi or his attorney contact me to discuss scheduling matters as required by Rule 26(f).

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June 2, 2008
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In light of defendant Khashoggi's default in answering the Complaint and Amended Complaint, on November 28, 2007, plaintiff moved for entry of a default judgment. On January 23, 2008, this Office was contacted by an attorney on defendant's behalf, Maranda E. Fritz, Esq. of Hinshaw & Culbertson LLP. Thereafter, the parties entered into a stipulation and proposed order (subsequently so ordered by this Court), wherein plaintiff agreed to withdraw its motion for entry of a default judgment; defendant admitted that he is subject to the jurisdiction of this Court; and defendant agreed to answer the Amended Complaint on or before February 8, 2008. Defendant filed an Answer with the Court on February 8, 2008.

On February 26, 2008, this Court issued a Scheduling Order, directing that Initial Disclosures be served on or before April 1, and that fact discovery be completed by September 15, 2008.

On April 1, Plaintiff served its Initial Disclosures. In addition, on March 11, 2008, plaintiff served its First Document Request and a Notice of Deposition of Defendant Khashoggi. To date, no documents have been produced by defendant and no response or objections have been received in response to the First Document Request, although objections and/or a response were due on or before April 10, 2008. In addition, defendant did not appear for his deposition, which was properly noticed for May 1, and no call or correspondence was received from his counsel prior to May 1 seeking to adjourn the deposition.

On April 15, 2008, I sent an email concerning this case to defendant's counsel (Maranda E. Fritz, Esq. of Hinshaw & Culbertson LLP) inquiring about the status of defendant's initial disclosures and response to plaintiff's First Document Request. After no response was received, I sent a letter, via facsimile and Federal Express, to defendant's counsel concerning defendant's discovery defaults, and requesting that she contact me no later than April 24, 2008.

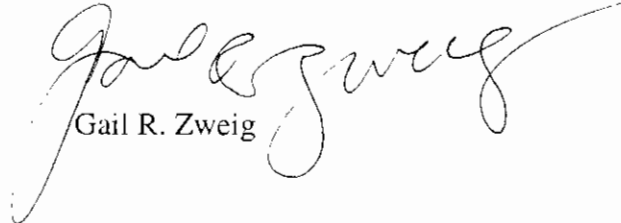
On May 2, Ms. Fritz left a message with my colleague, Howard Levi, requesting that he contact her. Finally, on May 8, 2008, I spoke to Ms. Fritz, who told me that defendant was prepared to produce documents by some date in June, and that her client would be available to be deposed but only abroad in light of her assertion that Mr. Khashoggi was not authorized to enter the United States. I asked defendant's counsel to, among other things, provide proof that defendant was not authorized to enter the United States; no such evidence has been adduced to date. Further, on May 8, I told Ms. Fritz that plaintiff could not agree to adjourn discovery dates to June in light of the Court's Scheduling Order.

I write to Your Honor to seek appropriate relief concerning defendant's defaults, including but not limited to an Order directing that defendant produce his initial disclosures and all documents in response to plaintiff's First Document Demand on or before June 16, 2008, and (since the Court has personal jurisdiction over defendant) directing defendant to appear at plaintiff's counsel's offices for a deposition on a date no later than July 11, 2008. Further, plaintiff respectfully requests that the Order further provide that if defendant Khashoggi fails to comply with the Court's Order, his Answer will be stricken. Alternatively, plaintiff respectfully

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requests that the Court schedule a conference to address these matters at its earliest possible convenience.

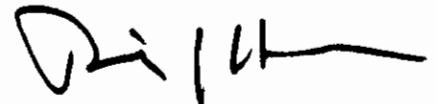
Respectfully submitted,


Gail R. Zweig

cc: Maranda E. Fritz, Esq.
(By Federal Express)

A conference in this case
shall be held on June 19, 2008
at 4:30 p.m. If defendant
fails to appear through counsel,
a default judgment shall
be entered.

SO ORDERED



US05

6/12/08